

June 18, 2014

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, GN Docket No. 12-268; *Protecting and Promoting the Open Internet*, GN Docket No. 14-28; *Acceleration of Broadband Deployment by Improving Wireless Facilities Siting Policies*, WT Docket No. 13-238; *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114.

Dear Ms. Dortch:

On June 16, 2014, Meredith Attwell Baker, President & CEO of CTIA – The Wireless Association® (“CTIA”) and Scott Bergmann, Vice President, Regulatory Affairs, CTIA, met with Roger Sherman, Chief of the Wireless Telecommunications Bureau, Federal Communications Commission (“FCC” or “Commission”), Jessica Almond, Chief of Staff, and Brian Regan, Senior Legal and Policy Advisor, to discuss a number of issues important to the wireless industry. CTIA explained that the U.S. is the world’s wireless industry leader and a significant driver of the economy.

CTIA highlighted the essential role that spectrum plays in facilitating the cycle of innovation and investment that characterizes the mobile wireless ecosystem. CTIA applauded the Commission’s adoption of the Broadcast Television Incentive Auction Report and Order, which represents a significant step toward a successful auction in the summer of 2015. CTIA explained that the Broadcast Television Incentive Auction has the potential to enable the deployment of significant additional spectrum for mobile broadband, spectrum that can be used to benefit American consumers and businesses through a new generation of wireless services.

In addition, CTIA reiterated its members’ commitment to an open Internet and a vibrant wireless ecosystem. CTIA urged the Commission to continue to recognize the unique technical, operational, and competitive differences that apply to mobile wireless broadband, whether it is the dependence on government for access to a critical source of capacity, spectrum, or the need to actively manage networks to ensure a high quality experience for consumers that seek access to the Internet wherever and whenever they want. Further, CTIA noted its deep concern with proposals that would impose anachronistic Title II regulation on

broadband Internet access offerings. The constantly evolving wireless ecosystem, which has brought so many revolutionary changes to the way Americans live, learn and work, should never be regulated like a utility. CTIA noted that Title II regulation is not necessary to preserve an open Internet, but rather would hinder the deployment of next-generation, wireless broadband services and would deter investment in network infrastructure, inhibit innovation and undercut U.S. competitiveness, all to the detriment of American consumers.

CTIA further explained that expediting the wireless siting process is essential to satisfying the demand for wireless broadband services and urged the FCC to act in its pending wireless infrastructure proceeding. CTIA highlighted that eliminating delays and unnecessary steps associated with siting is critical to providers' investment and deployment, as well as improving network resiliency and reliability.

CTIA also voiced its members' dedication to continuing to improve the ability of first responders to accurately identify the location of wireless 9-1-1 callers, whether they are located indoors or outdoors. CTIA stressed that the E-911 Phase II experience teaches that location accuracy benchmarks should be grounded in verified data, not aspirational target-setting. CTIA highlighted that there is no evidence that any location technology solution currently available or under consideration is capable of satisfying the Commission's proposed location information requirements on a nationwide basis within the timeframes proposed by agency.

CTIA expressed its commitment to continuing to work with the Commission across the broad range of issues to ensure that the U.S. remains the global leader in mobile broadband and the epicenter of the mobile Internet economy. Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please direct any questions to the undersigned.

Sincerely,

*/s/ Scott Bergmann*

Scott Bergmann  
Vice President – Regulatory Affairs  
CTIA – The Wireless Association®

cc: Roger Sherman  
Jessica Almond  
Brian Regan